## Case 1:21-cr-00247-PAE Document 99 Filed 12/15/21 Page 1 of 2



YELENA SHAROVA, ESQ. \*+ STEVEN GARFINKLE ESQ. \*+ CHARLES KASER ESQ. \* NANI KIM ESQ. \* CHARLES MARINO ESQ. \* BRUCE PROVDA ESQ. \* Telephone 1.718.766.5153
Facsimile 1.718.504.3599
Email ckaser@sharovalaw.com

PARALEGALS: FRANKLIN DAVIS JR ALVIN KORSUNSKIY CELINA QUEVEDO MABEL SANTANA HANNA SKARULIS

December 15th, 2021

## **VIA ELCTRONIC FILING**

Honorable Paul A. Engelmayer Judge of the United States District Court for The Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Apocalypse Bella

21 CR 247

Dear Judge Paul A. Engelmayer,

Counsel for Apocalypse Bella respectfully submits this letter seeking to modify the conditions of our client's curfew. The trial for this matter is scheduled to commence in or about May 2022.

Mr. Bella is requesting to be able to modify his curfew to have the ability to travel within the district of Oregon from 8 am and return home at 6pm.

It is my understanding that Pretrial Services, through Officer Alexander Ian, has no objection to this request. Additionally, the Government, through Assistant Attorney US Dina Mcleod, has no objections to this request.

Mr. Bella has been in complete compliance with the terms of her pretrial release.

Thank you for your time and attention in this matter.

**GRANTED.** The Clerk of Court shall terminate the motion at Dkt. No. 98. 12/15/2021

SO ORDERED.

PAUL A. ENGELMAYER United States District Judge Respectfully Submitted,

/s/ Charles Kaser

Charles Kaser, Esq. Attorney for the Defendant

Respectfully Submitted,

Page 2 of 2



Charles Kaser Attorney for the Defendant

By: /s/ Charles Kaser

CC: All Parties (via ECF)